

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NYU HOSPITALS CENTER,

Plaintiff,

- against -

THOMAS MOLLO and  
BLUE CROSS BLUE SHIELD OF FLORIDA, INC.

Defendants.

08 CV 6187 (RJS)

NOTICE OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE*

PLEASE TAKE NOTICE that upon the annexed affidavit of William J. Honan dated August 11, 2008 and the exhibits thereto, and all of the pleadings and prior proceedings in this action, defendant, Blue Cross Blue Shield of Florida, Inc. will move this Court, at the United States District Court for the Southern District of New York, for an order, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District courts for the Southern and Eastern Districts of New York, admitting Timothy J. Conner *pro hac vice* in the above-captioned matter.

Dated: New York, New York

August 11, 2008

HOLLAND & KNIGHT LLP

By: 

William J. Honan  
195 Broadway  
New York, New York 10007  
(212) 513-3200

Attorneys for Defendant

TO: William A. Hecht, Esquire  
William A. Hecht, P.C.  
901 North Broadway, Suite 3B  
White Plains, New York 10603

Attorney for Plaintiff

# 5452909\_v1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NYU HOSPITALS CENTER,

Plaintiff,

- against -

THOMASS MOLLO and  
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Defendants.

08 CV 6187 (RJS)

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District courts for the Southern and Eastern Districts of New York, I, William J. Honan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Timothy J. Conner, Esq.  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
Phone: 904-353-2000  
Fax: 904-358-1872  
Timothy.Conner@hklaw.com

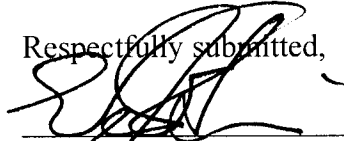
Timothy Conner is a member in good standing of the Bar of the State of Florida.

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There are no pending disciplinary proceedings against Timothy Conner in any State or Federal court.

August 11, 2008  
New York, NY

Respectfully submitted,

  
\_\_\_\_\_  
William J. Honan  
HOLLAND & KNIGHT LLP  
195 Broadway, 24th Floor  
New York, NY 10007  
(212) 513-3200

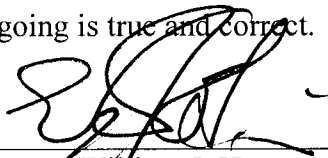
CERTIFICATE OF SERVICE

I hereby certify, pursuant to Title 28 U.S.C. §1746, that on August 11, 2008, I served a true and correct copy of the attached Motion to Admit Counsel Pro Hac Vice, by mailing it in a sealed envelope, with postage prepaid thereon, in an official depository of the U.S. Postal Service, to be delivered by First Class Mail to:

William A. Hecht, Esquire  
William A. Hecht, P.C.  
901 North Broadway, Suite 3B  
White Plains, New York 10603

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 11, 2008.

  
\_\_\_\_\_  
William J. Honan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NYU HOSPITALS CENTER,

Plaintiff,

- against -

THOMAS MOLLO and  
BLUE CROSS BLUE SHIELD OF FLORIDA, INC.

Defendants.

08 CV 6187 (RJS)

AFFIDAVIT OF WILLIAM J. HONAN  
IN SUPPORT OF MOTION TO ADMIT  
TIMOTHY J. CONNER  
PRO HAC VICE

WILLIAM J. HONAN, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the firm of Holland & Knight LLP, counsel for Defendant, Blue Cross Blue Shield of Florida, Inc., in above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit my partner Timothy Conner as counsel pro hac vice to represent Defendant Blue Cross Blue Shield of Florida, Inc. in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1970.
3. Mr. Conner is one of my partners at Holland & Knight LLP in our Jacksonville, Florida office.
4. I know Mr. Conner to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Mr. Conner is a member in good standing of the Bar of the State of Florida, having been admitted to that bar in 1988. A certificate of good standing from the Bar of the State of Florida, which was issued within the last thirty (30) days, is attached as Exhibit A.

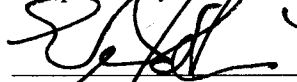
6. Accordingly, I am pleased to move the admission of Timothy Conner, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Timothy Conner, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Timothy Conner, *pro hac vice*, to represent Defendant, Blue Cross Blue Shield of Florida, Inc., in the above captioned matter, be granted.

Dated: August 11, 2008  
New York, New York

Respectfully submitted,



William J. Honan  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, NY 10007  
(212) 513-3200

Sworn to before me  
this 11th day of August, 2008.



Notary Public

# 5452957\_v1

**Elvin Ramos**  
Notary Public, State of New York  
NO. 01RA4870243  
Qualified in Queens County  
Certificate filed in New York County  
Commission Expires September 2, 2010

**EXHIBIT A**



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 767580  
Tim J. Conner  
Holland & Knight, LLP  
50 N. Laura St., Ste. 3900  
Jacksonville, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 26, 1988.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 30th day of July, 2008.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/smtzz3:R10



**EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NYU HOSPITALS CENTER,

Plaintiff,

- against -

THOMAS MOLLO and  
BLUE CROSS BLUE SHIELD OF FLORIDA, INC.

Defendants.

08 CV 6187 (RJS)

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of William J. Honan attorney for Defendant, Blue Cross Blue Shield of Florida, Inc. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Timothy J. Conner, Esq.  
Holland & Knight LLP  
50 North Laura Street, Suite 3900  
Jacksonville, FL 32202  
Phone: 904-353-2000  
Fax: 904-358-1872  
Timothy.Conner@hklaw.com

is admitted to practice *pro hac vice* as counsel for Defendant, Blue Cross Blue Shield of Florida, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: August \_\_, 2008  
New York, New York

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United States District Judge  
United States District Court Southern District of New York

# 5452936 v1